

**REMARKS**

Applicant submits this Amendment in reply to the Office Action mailed January 27, 2005.

By this Amendment, Applicant has amended claims 1 and 6 and added new claims 13 and 14. The originally filed specification, drawings, and claims fully support the subject matter of amended claims 1 and 6 and new claims 13 and 14. No new matter has been introduced.

Before entry of this Amendment, claims 1-12 were pending in this application. After entry of this Amendment, claims 1-14 are pending in this application. Claims 1 and 6 are the sole independent claims.

On page 2 of the Office Action, claims 1, 2, and 4 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,630,578 to Naramore et al. ("Naramore"). Applicant respectfully traverses this rejection.

Naramore does not disclose the claimed invention. For example, independent claims 1 recites a paper handling apparatus including, among other aspects, "a coupling section for coupling to other paper handling apparatus, the coupling section being provided at a position approximately equal to the paper guide opening or the paper discharge opening in a vertical direction." Naramore does not disclose at least this aspect of independent claim 1 either alone or in combination with the other aspects of independent claim 1.

Page 2 of the Office Action asserts that sheet output stacking system 21 corresponds to the paper guide opening, and that mounting aperture 16 and mounting hook 42 correspond to the coupling section of the claimed invention. Even assuming

*arguendo* that this is correct, mounting aperture 16 and mounting hook 42 are provided at a position vertically above sheet output stacking system 21, and not "at a position approximately equal... in a vertical direction" as set forth in claim 1. Accordingly, for at least this reason, Applicant respectfully requests withdrawal of the Section 102(b) rejection.

On pages 3-4 of the Office Action, claims 3, 5-10, and 12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Naramore in view of U.S. Patent No. 5,326,093 to Sollitt ("Sollitt"), and claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Naramore in view of Sollitt and further in view of U.S. Patent No. 5,752,154 to Maruyama et al. ("Maruyama"). Applicant respectfully traverses this rejection.

No combination of Naramore, Sollitt, and Maruyama discloses or suggests the claimed invention. For example, claims 3 and 5 depend from independent claim 1 which recites a paper handling apparatus including, among other aspects, "a coupling section for coupling to other paper handling apparatus, the coupling section being provided at a position approximately equal to the paper guide opening or the paper discharge opening in a vertical direction." In another example, independent claim 6 recites an image forming system including, among other aspects, "a coupling section for coupling to other paper handling apparatus, the coupling section being provided at a position approximately equal to the paper guide opening or the paper discharge opening in a vertical direction." As set forth above, Naramore does not disclose the aforementioned aspects of the claimed invention. Moreover, the Office Action does not set forth a *prima facie* case of obviousness, because it does not show how either Sollitt

or Maruyama remedy this deficiency of Naramore. Accordingly, for at least this reason, Applicant respectfully requests withdrawal of the Section 103(a) rejections.

Claims 2-5 and 7-14 depend either directly or ultimately from at least one of claims 1 and 6 and are therefore allowable for at least the same reasons claims 1 and 6 are allowable. Moreover, at least some of claims 2-5 and 7-14 recite unique features and/or combinations that are neither taught nor suggested by the cited art and therefore at least some of those claims are separately patentable.

Applicant requests the entry of this amendment, the withdrawal of the outstanding rejections, and the timely allowance of pending claims 15, 16, and 18-29. Applicant submits that this claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the timely allowance of the pending claims.

The Office Action contains characterizations of the claims and the related art with which Applicant does not necessarily agree. Unless expressly noted otherwise, Applicant declines to subscribe to any statement or characterization in the Office Action.

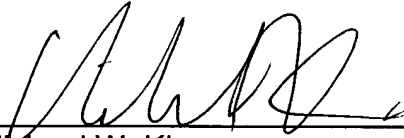
In discussing the specification, claims, and drawings in this Amendment, it is to be understood that Applicant is in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification and/or shown in the drawings. Rather, Applicant is entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

Please grant any extensions of time required to enter this Amendment and  
charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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Dated: April 27, 2005

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